

EXHIBIT “A”



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www.IMEWatchDog.com

April 14, 2023

VIA [CERTIFIED MAIL, RETURN RECEIPT REQUESTED]

Firm Name

Attn:

Address Line 1

Address Line 2

e-mail address 1

e-mail address 2

Dear _____

I trust this letter finds you well. I write to you to enclose a Court-Authorized Notice informing you that you are prohibited, by Order of United States District Court Judge Pamela Chen, from doing any business with Defendants IME Companions LLC, and Safa and Vito Gelardi and any individuals associated with them. This order was issued based on Judge Chen's finding that IME Watchdog has a high likelihood of success on the merits of its claims against Defendants IME Companions LLC, and Safa and Vito Gelardi wherein it is alleged that, *inter alia*, Defendants stole IME Watchdog's confidential information and trade secrets to start and build a competing business, acted to sabotage IME WatchDog's customer relationships, and defamed and spoke disparagingly of me.

For your reference, and to answer some of the questions you may undoubtedly have, I am attaching the most recent Order the Court issued in this case.

Your law firm was and remains an important and valuable customer of IME Watchdog. Although much damage was done to our reputation, we seek the opportunity to connect with you – in person, via zoom, or by telephone – to discuss your firm's needs and how we can be of service.

As you probably know, I founded IME WatchDog in 2011 because I saw the real need for such a service in running my own personal injury practice. As such, I have always been committed to serve the best interests of injured plaintiffs and the attorneys representing them, including taking on the insurance companies who wanted to keep us out of the exam room.





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IME Watchdog has successfully changed the law in every Department of the New York Supreme Court's Appellate Division following an extensive legal battle fully financed by IME WatchDog.¹ As such, IME WatchDog secured the right of every personal injury plaintiff to have a non-attorney representative of their choosing in the IME exam room. In addition, our watchdogs have also provided affidavits to successfully defeat threshold motions and served as credible witnesses at trial such that they have been instrumental in helping secure several seven figure settlements and verdicts.

Lastly, because I have been the subject of misinformation that has been disseminated alluding to the notion that your clients may be susceptible to being "poached" if you use IME Watchdog by virtue of my separate personal injury practice, I am prepared to sign an undertaking or any other legal instrument of your choosing, which will include a liquidated damages clause in the event of a breach, guaranteeing that any of your clients who are served by IME WatchDog would never be solicited nor retained by Daniella Levi & Associates, P.C. IME WatchDog did not rise to success by engaging in such conduct, and I am prepared to stand by the service we offer and re-establish my integrity.

I appreciate your time and consideration. Please let me know how and when we can connect to that we can rekindle and grow our business relationship.

I can always be reached directly on my cellular phone at (646) 660-2513.

Very truly yours

Daniella Levi, Esq.
Founder and CEO
IME WatchDog, Inc.

¹ See IME Watchdog, Inc. v. Baker, McEvoy, Morrissey & Moskovitz, P.C. - Am. Tr. Ins. Co., M-1959, 2016 WL 4133495 (1st Dept. Aug. 4, 2016); Henderson v. Ross, 147 A.D.3d 915 (2nd Dept. 2017); Martinez v. Pinard, 160 A.D.3d 440 (1st Dept. 2018); Santana v. Johnson, 154 A.D.3d 452 (1st Dept. 2017) Markel v Pure Power Boot Camp Inc. 171 A.D.3d28 (1st Dept.2019 Gonzalez v Red Hook Container Terminal, LLC 186 A.D.3d 1331 (2nd Dept. 2020) Pettinato v. Rivertower LLC 213 A.D.3d 46 (1st Dept. 2023).

